

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

JOHN AND JANE DOE NO. 1,	:	CASE NO. 3:22-cv-00337
et al.,	:	
	:	
Plaintiffs,	:	JUDGE MICHAEL J. NEWMAN
	:	
vs.	:	
	:	
BETHEL LOCAL SCHOOL	:	
DISTRICT BOARD OF	:	
EDUCATION, et al.,	:	
	:	
Defendants.	:	

DECLARATION OF STUDENT WITNESS NO. 3

I, Student Witness No. 3, declare:

1. My name is Student Witness No. 3.
2. I am 14 years old and a ninth grade student at Bethel Local Schools.
3. I have personal knowledge of all of the facts stated in this declaration, and my statements in this declaration are true and accurate to the best of my knowledge, information, and belief.
4. I am a girl.
5. I am a practicing Muslim.

6. As a young Muslim girl, I am trying to practice the faith and I recently began wearing a hijab. I wear this because I wish to protect my modesty, among other reasons.

7. My hijab prevents men from seeing me in an immodest light.

8. At this time, I am not a plaintiff in the current lawsuit.

9. Around lunch time on January 12, 2023, I was in the girls' communal restroom by the cafeteria in the high school.

10. I was in the restroom with several of my female Muslim friends and a number of other girls.

11. While I was in the restroom, I saw Anne Roe enter a bathroom stall that was occupied by another female student.

12. I could tell from their shoes under the stall that Anne Roe was standing up facing the other student who was sitting down facing Anne Roe.

13. Anne Roe and the other student were in the stall like that together for a few minutes.

14. It was my clear understanding that Anne Roe was receiving oral sex.

15. This was deeply disturbing for me. I felt violated and did not know who I could talk to about it. The feelings and emotions were such that I could not even bring myself to tell my family after school.

16. I am holding my urine at school to avoid using the restroom if at all possible.

I declare under penalty of perjury that the foregoing is true and correct.

2/3/2023
Date

Student witness No. 3
Student Witness No. 3